

Exhibit 8



1 A. PAPPU

2 A. Good morning.

3 Q. We met off the record, but my name
4 is Kelly Garcia. I'm an attorney with the
5 DOJ representing the United States in this
6 matter. I'm joined here today by Amanda
7 Strick, who is also an attorney with the
8 United States, and Morgan Feder, who is an
9 attorney with the New York Attorney General's
10 Office, as well as everyone who you just
11 heard on the phone.

12 A. Great.

13 Q. Could you please start by stating
14 your full name on the record?

15 A. Full name is Aparna Pappu.

16 Q. Ms. Pappu, you're represented here
17 by counsel today, correct?

18 A. These folks, right?

19 Yeah, the lawyers. Just checking.

20 MS. GARCIA: Counsel, could you
21 just clarify for the record that
22 you're here representing both the
23 party and the witness?

24 MS. SESSIONS: Yes, I'm here on
25 behalf of Google and the witness.

1 A. PAPPU

2 Q. Did you have any other roles at
3 Google?

4 A. After that?

5 Q. Correct.

6 A. So after being responsible for the
7 Ad Exchange, at some point, I can't remember
8 exactly when, I was made responsible for the
9 DFP, DoubleClick for the Publishers ad
10 serving team, or the team that -- the team
11 that built the system, as well the Ad
12 Exchange, so both those teams.

13 And then at some point after that
14 was also made responsible for the AdSense
15 team, and then I left the ads team.

16 Q. When did you leave the ads team?

17 A. I left in 2018.

18 Q. What was name of Google's Ad
19 Exchange while you were overseeing it?

20 A. The Google Ad Exchange, I think.

21 Q. Was it sometimes referred to as
22 AdX?

23 A. AdX, yes, also.

24 Q. You mentioned AdSense.

25 What is AdSense?

1 A. PAPPU

2 A. AdSense is a product for
3 publishers, also. Typically smaller
4 publishers where they can put a tag on their
5 page that allows them to call Google for ads,
6 basically.

7 Q. And how did AdSense differ from
8 DFP at that time?

9 MS. SESSIONS: Object to the
10 form.

11 A. It's quite a big question, I would
12 say. AdSense was a much more simple product
13 with very few controls because it was meant
14 for very simple, kind of, publisher use
15 cases, if you will.

16 Q. In your prior answer, you
17 mentioned "smaller publishers."

18 A. Yes.

19 Q. How would you use that term?

20 A. Meaning publishers who didn't have
21 a team who could configure -- like, could
22 hire people to run an ad server and things
23 like this. Because it requires people to
24 administer.

25 Q. And then by contrast, how would

1 A. PAPPU

2 you use the term "large publishers"?

3 A. A publisher that had a team that
4 would set up inventory that actually had,
5 sort of, a direct sales team that would sell
6 this inventory and, you know, just more
7 complexity as a result of that.

8 Q. And what product, if any, did
9 Google market towards large publishers?

10 A. DFP was the product that we built
11 for large publishers.

12 Q. Okay. Do you recall what your
13 title was when you were responsible for both
14 DFP and AdX?

15 A. I had two. At some point, I mean,
16 I was a director, and at some point I became
17 a vice president.

18 Q. Do you recall approximately when
19 you became a vice president?

20 A. Let me think back. Not
21 100 percent certain, but I want to say 2017.

22 Q. In your role as Vice President,
23 who did you report to?

24 A. When I was Vice President, I
25 reported to Eisar Lipkovitz.

1 A. PAPPU

2 Q. Okay. Am I correct that your
3 e-mail address at Google is
4 Apappu@google.com?

5 A. Yes.

6 Q. Has that been your work e-mail
7 address since you joined Google in 2007?

8 A. Yes.

9 Q. Did you use any other e-mail
10 addresses to conduct business during your
11 time at Google?

12 A. No.

13 Q. Without revealing the substance of
14 any communications with counsel, did you
15 receive a litigation hold in this case?

16 A. Yes.

17 Q. Do you recall approximately when
18 you received the litigation hold?

19 A. No.

20 Q. Do you recall whether it was
21 before or after January 2023?

22 A. No, don't recall. It was
23 definitely -- 2023, yes, it was probably
24 before.

25 Q. Before or after 2020?

1 A. PAPPU

2 A. Don't recall, sorry.

3 Q. Do use Chats to communicate with
4 co-workers at Google?

5 A. Yes.

6 Q. How do you refer to those chats?

7 A. Chat.

8 Q. Okay. And have you ever used
9 Chats to refer to -- excuse me. Strike that.

10 Have you ever used Chats to
11 communicate with co-workers about any aspect
12 of Google's digital advertising business?

13 A. You mean for work? Yeah. We use
14 Chat as part of our normal day-to-day.

15 Q. Have you taken any affirmative
16 steps to preserve Chats since receiving a
17 litigation hold in this case?

18 A. I just follow whatever the system
19 is.

20 Q. So can you tell me, one way or the
21 other, whether you took steps to turn history
22 on when discussing substantive matters?

23 A. For work today? I think history
24 is on by default now, but different --
25 different chat, I guess, configurations had

1 A. PAPPU

2 different settings for these things, so,
3 yeah.

4 Q. You said, "history is on by
5 default now."

6 Was there a time when history was
7 not on by default?

8 A. Yes. I think it depended on, I
9 believe, ad hoc chats because these are
10 informal, kind of, not super relevant in some
11 sense. Like, just chitchat and that kind of
12 thing. And those ad hoc chats, I believe,
13 were history of.

14 Q. And how did you distinguish
15 between the ad hoc chat, as you described it,
16 and a substantive chat?

17 A. Just a force of habit, usually, to
18 have substantive, kind of, conversations over
19 e-mail and Chat was more chitchat.

20 Q. So just to be clear, were there
21 any different types of chats that you could
22 use at that time to have substantive
23 conversations?

24 A. I don't know what that means.

25 Q. If you wanted to have a

1 A. PAPPU

2 conversation, a casual conversation with a
3 co-worker via Chat, would you use the same
4 Chat system --

5 A. Yes.

6 Q. -- as you would use to have a more
7 substantive conversation?

8 A. Yes.

9 Q. You said you left your role in --
10 on the ad side in approximately 2018?

11 A. Yes.

12 Q. Do you recall whether history was
13 on default at the time you left your position
14 in 2018?

15 A. I don't recall.

16 Q. And if the default setting on a
17 Chat group were history off, to your
18 knowledge, how long would those chats be
19 preserved?

20 A. No idea.

21 Q. Going back to your role as Vice
22 President of Google Ad Manager, was it?
23 Sorry.

24 When you were Vice President, what
25 was your full title?

A. PAPPU

MS. GARCIA: All right. Well,
thank you for your time. I don't have
any further questions.

THE WITNESS: Okay.

MS. SESSIONS: Per the
Protective Order, we will mark the
transcript as provisionally highly
confidential. For now we'd also like
to read and sign.

And we have no questions for the
witness, so we can go off the record.

THE VIDEOGRAPHER: The time is
5:43 p.m. We're off the record.

(Whereupon, at 5:43 p.m., the
Examination of this Witness was
concluded.)

APARNA PAPPU

Subscribed and sworn to before me
this ____ day of _____, 2023.

NOTARY PUBLIC

HIGHLY CONFIDENTIAL

ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: *United States et al. v. Google LLC*

Dep. Date: August 11, 2023

Deponent: Aparna Pappu

CORRECTIONS:

Page Line Changes or Corrections and Reasons

21	19	The phrase “share this ad” should read “show this ad” (Transcription Error)
31	16	The phrase “a tie that you could put on” should read “a tag that you could put on” (Transcription Error)
33	6	The name “Sasha Volkov” should read “Sasha Belikoff” (Transcription Error)
33	8	The name “Tromu” should read “Crasmaru” (Transcription Error)
33	8	The name “Nick Hilsinghul” should read “Nikhil Singhal” (Transcription Error)
33	10	The name “Liz Gravenstein” should read “Liz Grabenstein” (Transcription Error)
34	13-14	The phrase “once the publisher is configured” should read “once the publisher’s configured” (Transcription Error)
37	13	The phrase “were history of” should read “were history off” (Transcription Error)
40	14-15	The phrase “the freshness of the data was engraved” should read “the freshness of the data wasn’t great” (Transcription Error)
45	22	The phrase “Exchange Bidding was a service” should read “Exchange Bidding was a server” (Transcription Error)
52	23	The sentence “I can’t remember the other.” should read “I can’t remember the others.” (Transcription Error)
61	21-22	The sentence “The Google Ad Exchange, yes, a second price auction.” should read “The Google Ad Exchange, yes, it runs a second price auction.” (Transcription Error)
71	20	The phrase “not so much publisher Ad Exchange” should read “not so much publisher or Ad Exchange” (Transcription Error)
72	22-23	The phrase “whose name is outside of George and Max” should read “whose names outside of George and Max” (Transcription Error)
82	15	The phrase “this kind means” should read “this, kind of, means” (Transcription Error)

85	16	The name “Woonji” should read “Woojin” (Transcription Error)
85	17	The name “Woonji Kim” should read “Woojin Kim” (Transcription Error)
91	9	The phrase “there were tags” should read “they were tags” (Transcription Error)
93	3-4	The phrase “but I wouldn’t think – I don’t – it wasn’t a phrase.” should read “but I wouldn’t think. It wasn’t a phrase.” (Transcription Error)
102	15-16	The phrase “was that it’s not – it’s agencies. So it’s on behalf of advertisers.” should read “was that it’s not. It’s agencies, so it’s on behalf of advertisers.” (Transcription Error)
129	12	The phrase “if publishers said” should read “if a publisher said” (Transcription Error)
140	9	The phrase “Google” should read “Google’s” (Transcription Error)
141	20	The phrase “an engineer and GDN” should read “an engineer on the GDN” (Transcription Error)
144	25	The phrase “I don’t remember” should read “I don’t even remember” (Transcription Error)
150	15	The phrase “the customer account” should read “the customer count” (Transcription Error)
152	19	The phrase “I can’t compare to” should read “I can’t compare it to” (Transcription Error)
162	24-25	The phrase “other legitimate reasons” should read “are those legitimate reasons” (Transcription Error)
167	18	The phrase “the balance” should read “this balance” (Transcription Error)
179	12	The sentence “Say again. Sorry.” should read “For this? Say again. Sorry.” (Transcription Error)
179	20	The phrase “that’s in a summary” should read “I send a summary” (Transcription Error)
181	22	The phrase “with direct sole” should read “with direct sale” (Transcription Error)
195	25	The phrase “I know the contents in” should read “I know the concepts in” (Transcription Error)
210	10-11	The sentence “There’s no immediate, like, and the next day this happened.” should read “There’s no immediate, like - the next day this happened.” (Transcription Error)
214	8-9	The phrase “publishers were weary of low quality ads” should read “publishers were wary of low quality ads” (Transcription Error)

221	2	The phrase “engendering their trust” should read “engendering the trust” (Transcription Error)
222	14-15	The phrase “I don't know publishers were in favor of stricter policies” should read “I don't know if publishers were in favor of stricter policies” (Transcription Error)
223	12	The phrase “Within google” should read “Within Google” (Transcription Error)
229	10-12	The sentence “Not part of his role, given an engineering is not technically part of our roles.” should read “Not part of his role, given in engineering, it’s not technically part of our roles.” (Transcription Error)
229	17	The sentence “Oyes.” should read “Oh, yes.” (Transcription Error)
229	25	The phrase “but it was clear” should read “but it’s clear” (Transcription Error)
231	14	The phrase “there is” should read “there isn’t” (Transcription Error)
233	15	The phrase “I don’t know what DFP specifically” should read “I don’t know what seasonality specifically” (Transcription Error)
235	7	The phrase “for this particular gapping feature” should read “for this particular gap in feature” (Transcription Error)
236	19	The phrase “we would keep in the AdX” should read “we would keep in the Ad Exchange” (Transcription Error)
269	5	The name “Shirish Kumar” should read “Suresh Kumar” (Transcription Error)
272	11	The phrase “and talked about DFP's” should read “and I talked about DFP's” (Transcription Error)
273	21	The phrase “I believe complaints about something” should read “I believe had complaints about something” (Transcription Error)
280	2	The name “Sunani” should read “Sinaniyev” (Transcription Error)

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefor.

Date: 9/8/2023

Signature: _____